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February 27, 2009

MAILING ADDRESS POST OFFICE BOX 830 36101-0830 FAX 334.265.0319

Marlene H. Dortch Office of the Secretary Federal Communications Commission, 445 12th Street, SW Suite TW-A325 Washington, DC 20554

Re:

Ragland Telephone Company, Inc., and Ragland Long Distance Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI) Compliance Certification EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (collectively, "Ragland"), please find attached the annual CPNI Compliance Certification ("Certification") for Ragland for the year 2008 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Ragland has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at FCC@BCPIWEB.COM, as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

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Ragland Long Distance Company, Inc.

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Enclosure

cc: Tim Ford

Best Copy and Printing, Inc.



VICE-PRESIDENT

STEPHANIE JACKSON

STANLEY BEAN PLANT SUPERVISOR

POST OFFICE BOX 577 RAGLAND, ALABAMA 35131 205-472-2141 FAX 205-472-2145

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 25, 2009

Name of company covered by this certification: Ragland Telephone Company, Inc. and Ragland Long Distance, Inc.

Form 499 Filer ID: 804558

Name of signatory: Peggy Dickinson

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") Public Notice, DA 09-9 (released January 7, 2009), Ragland Telephone Company, Inc. and Ragland Long Distance, Inc. state as follows:

I, Peggy Dickinson, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed



STEPHANIE JACKSON VICE-PRESIDENT STANLEY BEAN PLANT SUPERVISOR

POST OFFICE BOX 577 RAGLAND, ALABAMA 35131 205-472-2141 FAX 205-472-2145

Before the Federal Communications Commission Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF RAGLAND TELEPHONE COMPANY, INC. AND RAGLAND LONG DISTANCE COMPANY, INC.

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (hereinafter, collectively "Ragland") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001 *et seq.* on behalf of Ragland:

- 1. I have personal knowledge that Ragland has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that Ragland obtains written approval for the use of its customers' CPNI and that Ragland has notified its customers of their right to restrict Ragland's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that Ragland has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001 *et seq.* and that Ragland has an express disciplinary process in place to deal with breaches of CPNI.

- 4. I have personal knowledge that Ragland implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that Ragland maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Ragland retains all such records for a minimum period of one (1) year.
- 6. I have personal knowledge that Ragland has established a supervisory review process regarding Ragland's compliance with outbound marketing situations and that Ragland maintains records of such compliance for a minimum period of one (1) year. Ragland's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- 7. I have personal knowledge that Ragland has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 25th day of February, 2009.

RAGLAND TELEPHONE COMPANY, INC. RAGLAND LONG DISTANCE COMPANY, INC.

By:

Peggy Dickinson

President